

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

FILE
JUN 27 2024

CLERK'S OFFICE
DETROIT

UNITED STATES OF AMERICA,

Plaintiff,

vs.

Criminal No. 22-cr-20504

Honorable Johnathan J.C. Grey

AWS MOHAMMED NASER,

Violations:

18 U.S.C. § 2339B(a)(1)

18 U.S.C. § 922(g)(1)

Defendant.

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

INTRODUCTION

Islamic State of Iraq and Al-Sham (ISIS)

1. On or about October 15, 2004, the United States Secretary of State designated al Qa'ida in Iraq ("AQI"), then known as Jam'at al Tawhid wa'al-Jihad, as a Foreign Terrorist Organization ("FTO") under Section 219 of the Immigration and Nationality Act (the "INA") and as a Specially Designated Global Terrorist entity under section 1(b) of Executive Order 13224.

2. In October 2006, The Islamic State of Iraq ("ISI") was announced, and Abu Omar al-Baghdadi was announced as the Amir al-Mu'mineen (Commander of the Faithful).

3. On or about December 11, 2012, the United States Secretary of State amended the designation of AQI as an FTO under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist entity under section 1(b) of Executive Order 13224 to add the following groups as aliases of AQI: al-Nusrah Front, Jabhat al-Nusrah, the Victory Front, and Al-Nusrah Front for the People of the Levant.

4. On or about May 15, 2014, the United States Secretary of State amended the designation of AQI as an FTO under Section 219 of the INA and as a Specially Designated Global Terrorist entity under section 1(b) of Executive Order 13224 to add the alias Islamic State of Iraq and the Levant (“ISIL”) as its primary name. The Secretary also added the following aliases to the FTO listing: the Islamic State of Iraq and al-Sham (i.e., “ISIS”—which is how the FTO will be referenced herein), the Islamic State of Iraq and Syria, ad-Dawla al-Islamiyya fi al-‘Iraq wa-sh-Sham, Daesh, Dawla al Islamiya, and Al-Furqan Establishment for Media Production. On that date, Al-Nusrah Front, also known as Jabhat al-Nusrah, also known as Jabhet al-Nusra, also known as The Victory Front, also known as Al Nusrah Front for the People of the Levant, was removed from the list of AQI aliases.

5. On or about September 21, 2015, the United States Secretary of State added the following aliases to the FTO listing: Islamic State, ISIL, and ISIS. To date, ISIS remains a designated FTO.

COUNT ONE

18 U.S.C. § 2339B(a)(1)

**(ATTEMPTING TO PROVIDE MATERIAL SUPPORT AND RESOURCES TO A FOREIGN
TERRORIST ORGANIZATION)**

On an exact date that is unknown, but by at least 2012, through October 30, 2017, both dates being approximate and inclusive, in the Eastern District of Michigan and elsewhere, AWS MOHAMMED NASER, did knowingly attempt to provide material support and resources, including personnel (including himself) and services to a foreign terrorist organization, to wit: the Islamic State of Iraq and al-Sham, previously known as al Qa'ida in Iraq, hereinafter referred to as "ISIS," which, at all times relevant to this Indictment, was designated by the United States Secretary of State as a foreign terrorist organization, knowing that ISIS was a designated foreign terrorist organization and that ISIS engages and has engaged in terrorist activity and terrorism.

Among other things, as part of the charged offense:

1. Between at least March 2011, and January 2013, NASER maintained a YouTube channel account, which contained the following description:

*Jihad for the sake of Allah is all i want in this life. And if i get
Martydom i'll ask Allah if i can go Back and do it Agian.
Occupation: Full time Mujahd A.K.A Slave of Allah
Companies: Mujahdeen Sniper.*

2. Between approximately September 2012 and December 2012, NASER and PERSON A discussed NASER's travel to Syria to join PERSON A, who had joined al-Nusrah Front, an alias of the designated FTO AQI until May 15, 2014.

3. On September 14, 2012, NASER contacted PERSON A, assured PERSON A that he would join him in Syria as soon as possible and, referring to money, NASER assured PERSON A that he would "*bring what we need & more.*"

4. In October 2012, NASER purchased a tactical knife and a sword concealed in a cane.

5. On November 1, 2012, NASER searched the internet for a "Glock 9mm" firearm and for ammunition.

6. On November 1 and 4, 2012, NASER searched the internet for "bushnell scopes" and "bushnell sniper scope."

7. On November 3, 2012, NASER searched the internet for "The Black Flag of Islam."

8. On November 7, 2012, NASER traveled to Detroit Metropolitan Airport, checked luggage, and attempted to board a flight from Detroit, Michigan to Irbil, Iraq, via Chicago, Illinois and Istanbul, Turkey, with a tactical knife and a sword concealed in a cane in his luggage.

9. Between November 10-11, 2012, NASER searched the internet for airports in Canada and Mexico.

10. On January 2, 2013, NASER traveled to Chicago, Illinois, and attempted to board a flight from Chicago O'Hare Airport bound for Beirut, Lebanon.

11. On January 3, 2013, NASER posted a video on his YouTube account to warn jihadists that PERSON A was not a "real Muslim" under the mistaken belief that PERSON A was a government agent or informant who was working with the Federal Bureau of Investigation.

12. On May 27, 2016, NASER created a Telegram account with the username ISxxxIS, and the display name Abu Hamza (translated from Arabic).

13. On May 27, 2016, NASER created a Telegram bot with the username ISxOne1Bot and a display name Dabiq (translated from Arabic).

14. On March 12, 2017, NASER used his ISxxxIS Telegram account to send a text message containing instructions for the manufacture of "copper azide," an explosive, to his ISxOne1Bot Telegram account.

15. By at least April 11, 2017, NASER created a PalTalk account with the display name MuslimX1 and joined PalTalk groups dedicated to the supporters of ISIS.

16. On April 15, 2017, NASER, using MuslimX1, participated in a PalTalk ISIS supporters group chat and asked another participant in Arabic, "*Do you know how to make explosives?*"

17. On April 15, 2017, NASER, using MuslimX1, downloaded a video which provides step-by-step instructions for (1) manufacturing the explosive triacetone triperoxide (“TATP”)—a highly volatile material, which is made by combining sulfuric acid, hydrogen peroxide, and acetone—and (2) assembling an improvised explosive device with fragmentation.

18. On April 20, 2017, NASER, using MuslimX1, joined a PalTalk ISIS supporters chatroom audio conversation. He expressed support for ISIS and encouraged Paltalk chat group users to extend their support for ISIS beyond the chatroom, and to go out and walk the streets of their towns and see what they can do to support ISIS in a real matter.

19. On May 10, 2017, NASER sent a video from his ISxxxIS Telegram account to his ISxOne1Bot Telegram account. The video was labeled in Arabic. Translated, the video was entitled, “*Attack them O’ monotheist. The making of the simplest effective explosive charge at home.*”

20. On May 19, 2017, NASER possessed materials related to drones and Arabic handwritten statements expressing support for ISIS. Translated, the statements included: “*It is destined by fate; I am the son of the Islamic State. If the mountains swayed, I will not sway*” and “*We are the soldiers of the Caliphate, we shoot [a] word and a bullet.*”

21. On July 4, 2017, NASER sent a video from his ISxxxIS Telegram account to his ISxOne1Bot Telegram account. The video was labeled in Arabic. Translated, the video was entitled, "*Attack where they live.*"

22. On July 7, 2017, NASER sent an Arabic language text and image from his ISxxxIS Telegram account to his ISxOne1Bot Telegram account. Translated, the text stated, "*We renew our oath of allegiance to Caliph Abu Bakr Al-Baghdadi, by choice, to listen and to obey in joy and in discontent, and in good times and in bad. That we shall not fight anyone against something, unless there is clear Blasphemy that God proves to us; and God is a witness to what we say.*"

23. In approximately September through October 2017, NASER moved his family out of his three-bedroom residence and relocated himself to the basement of the home.

24. On September 17, 2017, NASER joined the Ansar Dawlat AlKhalifa AlIslamiya (Supporters of the Islamic Caliphate State) chatgroup on Telegram and posted messages in Arabic. Translated, the messages included the following: "*best thing is to hit the [Social Media Company 1] company* 🚀"; "*A booby trapped truck would let [Social Media Company 1] quit canceling Al-Ansar [supporters]*"; and "*Victory or martyrdom is victory.*"

25. On September 29, 2017, NASER returned to the Ansar Dawlat AlKhilafah AlIslamiya chatgroup on Telegram and posted messages. When asked

by a participant: “*are you isis supporters?*”, NASER replied: “*yes we are.*” The other participant asked NASER “*why my brother?*” and NASER answered, “*we muslims that’s why.*” In addition, when a participant posted in Arabic, “*Do not deprive yourself from killing an infidel, even once in your lifetime,*” NASER responded with “*Amen!!!!*”

26. On October 17, 2017, during a PalTalk chatroom discussion, NASER recited the sentence in Arabic: “*I am the son of the Islamic State. If the mountains swayed, I will not sway.*” He also stated: “*He [God] did not allow us to join now, because He . . . wants us for something else. I mean—to join later;*” and “*the more that I see the [Islamic] State in distress . . . the more my heart aches for it. No, I would never expect anything bad from God. . . I am worried that . . . I am not . . . with them, I mean. I am not there . . . This is the only thing that . . . one might be worried about. I mean, even if the cause ends, . . . I would be sorry that I did not end with them. Do you understand me? I would not want to keep on existing . . . while the [Islamic] State does not exist anymore, for example. We were dreaming about this [Islamic] State, my brothers. I swear by God that we were dreaming about it. Okay? We were dreaming about it. And now it has become a reality.*”

27. On October 30, 2017, NASER possessed the following chemicals in the basement of his home: sulfuric acid, acetone, hydrogen peroxide, cyanuric acid, and calcium hypochlorite. In the same location, NASER possessed: measuring cups and

glassware, coffee filters, a syringe, gloves, a glue gun and sticks, wooden dowels, digital timers, 2-way radios, Christmas tree lights, matches, electronic components and wires, tactical and other knives, a sword concealed in a cane, drones, and drone-related materials. NASER also possessed in other locations: BBs, hunting pellets, CO2 cartridges, a stun gun, a knife, a round of .38 caliber ammunition, and a pellet gun.

All in violation of Title 18, United States Code, Section 2339B(a)(1).

COUNT TWO

18 U.S.C. § 922(g)(1)

(FELON IN POSSESSION OF A DESTRUCTIVE DEVICE)

On or about October 30, 2017, in the Eastern District of Michigan, the defendant, AWS MOHAMMED NASER, knowing that he had been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm, to wit: a destructive device, more specifically, a combination of parts either designed or intended for use in converting any device into any destructive device and from which a destructive device may be readily assembled, all in violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATION

18 U.S.C. §§ 924(d)(1), 981(a)(1)(C), (G), and 28 U.S.C. § 2461(c)

(CRIMINAL FORFEITURE)

The allegations contained in this Superseding Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Sections, 924(d)(1), 981(a)(1)(G), as all incorporated through Title 28, United States Code, Section 2461(c), and Federal Rule of Criminal Procedure 32.2.

Pursuant to Title 18, United States Code, Sections 981(a)(1)(G) upon conviction of the offense set forth in Count One of the Superseding Indictment, in violation of Title 21, United States Code, Section 2339B(a)(1), the defendant, AWS MOHAMMED NASER, shall forfeit to the United States of America:

- (i) All assets, foreign or domestic, of defendant AWS MOHAMMED NASER, as an individual, entity, or organization engaged in planning or perpetrating a Federal crime of terrorism against the United States, citizens or residents of the United States, or their property, and all assets, foreign or domestic, affording defendant AWS MOHAMMED NASER a source of influence over any such entity or organization;
- (ii) All assets, foreign or domestic, acquired or maintained by the defendant, AWS MOHAMMED NASER, with the intent and for the purpose of supporting, planning, conducting, or concealing his Count One offense;

- (iii) All assets, foreign or domestic derived from, involved in, or used or intended to be used to commit his Count One offense; or

Pursuant to Title 18, United States Code, Section 924(d) upon conviction of the offense set forth in Count Two the Superseding Indictment, in violation of Title 18, United States Code, Section 922(g)(1), defendant AWS MOHAMMED NASER shall forfeit to the United States his interest in any firearm or ammunition involved in the offense.

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

THIS IS A TRUE BILL.

s/Grand Jury Foreperson
Grand Jury Foreperson

DAWN N. ISON
United States Attorney

s/ Saima S. Mohsin
SAIMA S. MOHSIN
Assistant United States Attorney

s/ Dmitriy Slavin
DMITRIY SLAVIN
Trial Attorney,
United States Department of Justice

Dated: June 27, 2024

ORIGINAL

United States District Court Eastern District of Michigan	Criminal Case Cover Sheet	Case Number
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :		Companion Case Number:
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Judge Assigned:
		AUSA's Initials: <i>MM</i>

Case Title: USA v. Aws Mohammed NaserCounty where offense occurred : WayneCheck One: ☒ Felony ☐ Misdemeanor ☐ Petty Indictment/ Information --- no prior complaint. Indictment/ Information --- based upon prior complaint [Case number:]☒ Indictment/ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].**Superseding Case Information**Superseding to Case No: 22-20504Judge: Johnathan J.C. Grey

- ☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant nameChargesPrior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

June 27, 2024

Date

Saima S. Mohsin by Mem

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Attorney Bar #:

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.